

SUPPLEMENT C
TO
EAST ALTAMONT ENERGY CENTER
APPLICATION FOR CERTIFICATION
(01-AFC-4)

Submitted to:
California Energy Commission
Sacramento, California

Prepared by:
East Altamont Energy Center, Limited Liability Company

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**East Altamont Energy Center
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1.0 INTRODUCTION

East Altamont Energy Center, Limited Liability Company (EAEC LLC) proposes to develop a natural-gas-fired generating facility at the northeastern edge of Alameda County. The proposed East Altamont Energy Center (EAEC) will be a high-efficiency, combined-cycle facility that will sell electricity in the deregulated electricity market established in California on March 31, 1998. On March 20, 2001, EAEC LLC filed an Application for Certification (AFC) with the California Energy Commission (CEC).

In the AFC, EAEC LLC identified a preferred natural gas line route for the project (labeled Alternative 2a). This gas line connected into PG&E's main pipeline that runs northwest-southeast approximately 1.8 miles west of the project parcel. EAEC LLC has identified a new natural gas line route that eliminates certain engineering constraints associated with the original preferred gas line route identified in the AFC. EAEC LLC proposes to replace the existing preferred gas route (Alternative 2a) with the new route. The new gas line route is approximately 1.8 miles in length, the same length as the existing preferred gas line route, as shown in Figure 1.

This supplemental filing (Supplement C) presents an analysis of the potential environmental impacts of the new preferred gas line route. The Supplement also includes the addition of a fiber optic cable from the EAEC switchyard to the Tracy Substation. The fiber optic cable, which was requested by the Western Area Power Administration (Western), will provide a second communications path between the switchyard and the substation. Figure 2 indicates the location of the fiber optic cable. The figure also includes minor refinements to the routes of the other linear facilities. These refinements should not affect the California Energy Commission's analysis of the project; they simply more accurately indicate where the lines enter EAEC LLC's 174-acre parcel and the project site.

Lastly, EAEC LLC is adding approximately 9 acres of additional construction laydown areas to the south and north sides of the site. Specifically, a 5-acre laydown area will be added to the southwest corner of the site, west of the project switchyard. This laydown area will be used for the construction of the switchyard and the 230 kV transmission line. A 4-acre laydown area will be added to the north side of the site. This area will connect the 20-acre originally proposed laydown area to the project site. The additional laydown areas are indicated in Figure 3.

2.0 REVISED PROJECT DESCRIPTION

This section describes the gas pipeline route modification, the fiber optic cable, minor refinements to the project linears, and the additional laydown areas.

2.1 Gas Pipeline Modification

EAEC LLC is proposing a new natural gas line route as the preferred route for the EAEC project. This new gas line route follows the existing preferred route (Alternative 2a in the AFC) from the project site, heading south parallel to Mountain House Road (approximately 0.5 miles). At Kelso Road the route turns west, crossing under Mountain House Road and proceeds west on the north side of Kelso Road for approximately 0.4 miles. At the Delta Mendota Aqueduct, the new gas line route turns southwest under Kelso Road (avoiding the canal located adjacent to the Aqueduct) and along the eastern side of the Delta Mendota Aqueduct and proceeds for another 0.9 miles until it reaches the PG&E main pipeline. A gas metering station utilizing an area of approximately 1 acre (150 feet by 150 feet) is required at the interconnection point with PG&E's transmission pipeline. The last 0.5 mile of this new gas line route and the metering station are the same as for Alternative Route 2e previously described in the AFC. The new gas line is approximately 1.8 miles in length, the same length as the existing preferred gas line route. Figure 1 presents the preferred route identified in the AFC, Alternative Route 2e, and the new preferred route.

The new gas line would be constructed using a standard trenching technique. Trenching, horizontal directional drilling (HDD) or the jack-and-bore construction method will be used at the roadway crossings.

2.2 Fiber Optic Cable

Western has requested that an approximately 8-inch fiber optic cable conduit be installed from the project switchyard across Mountain House Road to the Tracy Substation. The purpose of the cable is to provide a second communications path between the switchyard and the substation. The fiber optic cable route will exit the project site at the switchyard and head west, crossing Mountain House Road. The route will then follow an existing dirt access road on the substation property and enter the substation on its north side. Figure 2 presents the location of the fiber optic cable.

The fiber optic cable will be constructed using a standard trenching technique. For construction within Mountain House Road, one lane of traffic will always remain open. In addition, construction hours will be scheduled to avoid peak commute periods. The specific traffic control measures will be detailed in the Construction Traffic Control and Transportation Demand P, required pursuant to Condition of Certification TRANS-1.

2.3 Linear Refinements

Figure 2 also presents minor refinements to the project linears, specifically, the recycled water line, the raw water line, and the transmission line. The refinements to these linears are discussed below.

2.3.1 Recycled Water Pipeline

In the AFC, EAEC LLC stated that the recycled water pipeline will either be on the north or south side of Byron Bethany Road. In addition, Figure 2.1-1 (of the AFC) indicated that the water line route will enter EAEC LLC's 174-acre parcel at the intersection of Mountain House Road and Byron Bethany Road (the northwest corner of the parcel).

EAEC LLC has refined the route of the recycled water line by determining that it will be placed on the south side of Byron Bethany Road. This will avoid biological and cultural resources which exist on the north side of Byron Bethany road. In addition, the line will now enter the 174-acre parcel at the northeast corner, rather than the northwest corner.

2.3.2 Raw Water Pipeline

Figure 2.1-1 in the AFC, indicated that the raw water pipeline will be directionally drilled under the Delta Mendota Canal, traveling down the west side of Mountain House Road, then crossing Mountain House Road to the project site.

EAEC LLC has refined the route by extending the horizontal directional drill so that the pipe will "daylight" on the EAEC LLC 174 acre parcel, which is on the east side of Mountain House Road. This will eliminate the trenching of Mountain House road for this project feature.

2.3.3 Transmission Line

Figure 2.1-1 in the AFC, incorrectly labeled the preferred transmission line route. However, it was correctly described in the AFC and in AFC Figure 5.1-2. Figure 2 accurately identifies the preferred transmission line route.

2.4 Additional Laydown Areas

EAEC LLC is adding two additional laydown areas totaling approximately 9 acres to the south and north sides of the project site. Specifically, a 5-acre laydown area will be added to the southwest corner of the site, west of the project switchyard. This laydown area will be used for the construction of the switchyard and 230 kV transmission. A laydown area adjacent to the switchyard will be more efficient than using the laydown area north of the site, since the switchyard components will be stored closer to where they will be needed. A 4-acre laydown area will be added to the north side of the site. This area will connect the 20-acre originally proposed laydown area to the project site. The new area will most likely be used for locating the construction trailers. The additional laydown areas are indicated in Figure 3.

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Figure 1

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Figure 2

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Figure 3

3.0 ENVIRONMENTAL ANALYSIS

This section contains an assessment of potential environmental impacts resulting from the modified gas pipeline route, the fiber optic cable, minor refinements to the recycled water pipeline and the raw water pipeline, and the two additional laydown areas.

3.1 Air Quality

The new gas line route is the same length as the existing preferred gas line (Alternative 2a). Therefore, the amount of soil disturbed is approximately the same and the potential impacts to air quality remain the same as those described in Section 8.1 of the AFC.

The construction of the fiber optic cable and the two additional laydown areas will result in slightly more soil disturbance than described in the AFC. However, the refinements to the recycled water pipeline and the raw water pipeline will reduce the amount of construction required for the two linears. Any potential air quality impacts will be short-term. In addition, dust suppression will be used where appropriate to mitigate any air quality impacts associated with soil disturbance. The laydown areas will also be overlain with gravel.

3.2 Biological Resources

Biological resources along the new gas line route were evaluated by reviewing the California Natural Diversity Data Base, reviewing aerial photographs, and consulting with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG). Biological resources were also confirmed with field surveys. The new gas line route was surveyed during winter, spring, summer and fall of 2001 by meandering transects along the alignment. Based on initial reconnaissance level surveys, protocol level surveys for special status plants were not considered necessary to predict which animals were likely to occur. This was based in part on the highly disturbed condition of the new gas line route.

As described previously, the gas line would run under or adjacent to existing paved roads (Mountain House and Kelso), adjacent to the buried portion of the Delta Mendota pipelines and across an annual grassland pasture to the new metering station. The portion of the alignment along the road and buried part of the Delta-Mendota Canal are in soils that were excavated, graded and filled during local construction, and do not retain the characteristics of the native soils. Plants that invaded and now dominate these areas are primarily a mix of annual grassland species common to ruderal environments. Brome grass, wild mustard, and filaree are typical dominant species. Wildlife can use this habitat for foraging, nesting and cover, but the habitat type is common and widespread. Common animals using this habitat include pocket gophers, California ground squirrel, California vole, western meadowlark, savannah sparrows and Brewer's blackbirds. Burrowing owls and San Joaquin kit foxes could possibly use this area, particularly on the berm slopes west of the pipeline alignment and where burrows are abundant.

The portion of the new gas line route that crosses open pasture is dominated by mediterranean annual grasses common throughout the foothills and Central Valley. The same species present here are also present elsewhere throughout the project.

With respect to special status species, the southern portion of the pipeline crosses through an area that is defined as critical habitat for the California red-legged frog (refer to Figure 8.2-2R). Tiger salamanders are known to occur within 0.5 mile and could potentially disperse across this area or aestivate in upland burrows during summer months, although none was observed. The USFWS reports that San Joaquin kit foxes have been historically reported in the region and may use the Delta-Mendota Canal as dispersal corridor, although

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there are no recent records. Red fox, which is an aggressive competitor of kit fox, have been commonly reported in this area.

The proposed pipeline crosses 3 potential wetland areas that could support red legged frog and western pond turtle. These 3 areas are packed-earth or concrete-lined canals operated by BBID (Canals 70, 120 and 155). They are seasonally dry and lack aquatic or riparian vegetation that would support fish or wildlife year round. Constructing in these areas during the dry season (when flow is not present in the canal) and preventing adverse impacts to water quality will be sufficient to avoid significant adverse impacts to sensitive species. In addition, the Biological Resources Mitigation Monitoring and Implementation Plan will address the monitoring of listed species prior to and during construction of the gas pipeline.

The biological resources that could potentially occur along the new gas pipeline route, the fiber optic cable, and the two additional laydown areas are the same as those that occur elsewhere in the project, and the same measures used to avoid impacts elsewhere will be implemented in these areas. However, the two additional laydown areas will increase the number of acres to be temporarily disturbed by the project by 9 acres. The temporary construction impact will be mitigated through the acquisition of off-site habitat. In addition, the portion of the laydown areas which are not occupied by landscaping will be returned to agricultural use after construction.

The minor refinements to the recycled water pipeline and the raw water pipeline will reduce the amount of construction originally required for those lines. Therefore potential impacts to biological resources will be slightly less than those described in the AFC for these project features.

3.3 Cultural Resources

The revised gas line route (as shown on Figure 2.1-1R) has been previously surveyed by Roger H. Werner (President, Archaeological Services, Inc., Stockton, California) under contract to Jones & Stokes Associates, Incorporated¹. This survey included the entire United States Bureau of Reclamation right-of-way (ROW) from fence line to fence line, and from the southern end of the Tracy Pumping Station at the north end of the ROW to the location where the Delta-Mendota Canal is above ground at the southern end of the ROW.

Mr. Roger H. Werner, who has a Master of Arts degree in Anthropology and 14 years archaeological field experience in California (since 1988), conducted a Class III cultural resources investigation in accordance with applicable federal regulations and standards. Relevant portions of the Werner report are provided here:

Summary: The APE appears to be located in an area with a low archaeological sensitivity. While numerous field surveys have been conducted few archaeological sites of any type have been found in the vicinity. Late prehistoric inhabitants of the area considered it a hinterland. In the historic period, the primary economic activity appears to have been cattle grazing. Construction for both the Delta-Mendota Canal and the California Aqueduct resulted in the deposition of large quantities of back dirt directly adjacent to the canals. These events may have obscured or destroyed existing archaeological remains (Jones and Stokes 1988:7).

Field Survey: All portions of the APE (defined as the area between the actual canal and the fence line marking the Federal property boundary – in most places this area

¹ Jones and Stokes Associates. 1988. *Cultural Resource Survey for the Proposed Delta Mendota Canal, California Aqueduct Intertie, Alameda County, California*. Report S-11647 on file, California Historical Resources Information System, Sonoma State University, Rohnert Park.

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did not exceed 50 feet) were visually inspected; only those areas containing original ground surface were surveyed intensively on-foot. In that a fence line marked the Federal property boundary, previous field work conducted by Holman between 1982 and 1985 on adjacent private property probably did not include the Delta Mendota Canal right-of-way. Thus, the APE has not been subject to previous archaeological study (Jones and Stokes 1988:7)

No prehistoric or historic archaeological remains were noted within the APE. The lack of archaeological sites follows the pattern for the area; it appears that the eastern slopes of the Coast Range in northeastern Alameda County were sporadically used both prehistorically and historically. If archaeological sites did exist within the APE they would probably be covered with fill (Jones and Stokes 1988:9).

Recommendations: In that no significant cultural resources were found during the field survey, no specific recommendations need be offered herein. If during the course of excavation and/or construction archaeological materials such as obsidian, ground stone, bedrock mortars, bone, colored glass, ceramics, or similar materials are uncovered, a qualified archaeologist should be retained to evaluate the finds for significance and proposed recommendations as appropriate (Jones and Stokes 1988:10).

Based on the Jones and Stokes survey results presented above, the construction and operation of this new gas line are not expected to cause an impact to cultural resources. Furthermore, based on an historic survey presented by the Commission Staff in the Preliminary Staff Assessment (PSA 2001:5.2-20), if the construction of the linear facilities does not affect the Delta-Mendota Canal, then no historic impacts are expected.

The cultural resource inventories and field surveys for the plant site did not identify any cultural resources sites within the project Area of Potential Effect (APE). Therefore the construction of the fiber optic cable and the additional laydown areas will not result in cultural resources impacts different than those previously identified in the AFC.

In addition, the refinements to the recycled water pipeline and the raw water pipeline will reduce the amount of construction originally required for those lines. Therefore potential impacts to cultural resources will be slightly less than those described in the AFC for these project features.

3.4 Land Use

Potential impacts to land use remain the same as those described in Section 8.4 of the AFC. The revised natural gas line route, fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in land use impacts other than those previously identified.

3.5 Noise

Potential impacts to noise conditions remain the same as those described in Section 8.5 of the AFC. The revised natural gas line route, fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in noise impacts other than those previously identified.

3.6 Public Health

Potential impacts to public health remain the same as those described in Section 8.6 of the AFC. The revised natural gas line route, fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in Public Health impacts other than those previously identified.

3.7 Worker Health and Safety

Potential impacts to worker health and safety were described in Section 8.7 of the AFC. The revised natural gas line route, fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in worker health and safety impacts other than those previously identified.

3.8 Socioeconomics

Potential impacts to socioeconomic resources were described in Section 8.8 of the AFC. The revised natural gas line route, fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in socioeconomic resources impacts different than those previously identified.

3.9 Agriculture and Soils

Potential impacts to agriculture and soils were described in Section 8.9 of the AFC. The revised natural gas line route, fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in Agricultural and Soils impacts different than those previously identified.

3.10 Traffic and Transportation

Potential impacts to Traffic and Transportation were described in Section 8.10 of the AFC. The revised natural gas line route will result in impacts less than those previously identified in Section 8.10 of the AFC since there will be 1 mile less construction along Kelso Road with the new preferred route than with Alternative Route 2a. Road crossings will use either the open trench method, HDD, or jack-and-bore as described in the AFC.

For construction of the fiber optic cable across Mountain House Road, one lane of traffic will remain open at all times. It is estimated that the construction effort will take approximately 3 days. Construction hours would be scheduled to avoid peak traffic commute periods. The specific traffic control measures to be implemented would be detailed in the construction traffic control and transportation demand implementation program, required pursuant to Condition TRANS-1.

The additional laydown areas will not result in Traffic and Transportation impacts different than those previously identified in the AFC. In addition, the refinements to the recycled water pipeline and the raw water pipeline will reduce the amount of construction originally required for those lines. Therefore potential traffic impacts will be slightly less compared to the original routes.

3.11 Visual Resources

Potential impacts to visual resources were described in Section 8.11 of the AFC. The new natural gas line route and gas metering station will not result in impacts different than those previously identified in this AFC Section. The gas metering station will be sited in the spot identified in the AFC for Alternative route 2e. As stated on page 8.11-17 of the AFC, this

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location along the PG&E pipeline adjacent to the Delta-Mendota Canal is "somewhat removed from potential viewers and where the berm along the canal would provide backdropping for the stations' features." The closet publicly accessible areas from which the gas metering station will be potentially visible are along Mountain House and Kelso Roads, at points 0.7 mile and further from the site. Given the metering station's distance from viewers, the small scale of the equipment entailed, and the high potential for visual absorption into the backdrop, the visual impact of this facility will be minimal and less than significant.

As indicated in the AFC, any noticeable visual effects associated with the new natural gas pipeline route, the fiber optic cable, the additional laydown areas, and other pipelines will be restricted to the construction phase and will be minor, temporary, and less than significant. Because the ground surface affected by construction will be restored to its original condition, the pipelines, fiber optic cable, and the additional laydown areas will have no long-term visual impacts.

3.12 Hazardous Materials Handling

No additional hazardous materials will be used, stored, transported, or handled for the revised gas line route beyond those described in Section 8.12 of the AFC. The revised natural gas line route, fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in impacts different than those previously identified in Section 8.12 of the AFC.

3.13 Waste Management

No additional waste materials will be generated for the revised gas line route beyond those described in Section 8.13 of the AFC. The revised natural gas line route, fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in impacts different than those previously identified in Section 8.13 of the AFC.

3.14 Water Resources

The proposed pipeline crosses 3 canals operated by BBID (Canals 70, 120 and 155). They are seasonally dry. Constructing in these areas during the dry season or otherwise coordinating construction schedules with BBID and preventing adverse impacts to water quality would be sufficient to avoid significant adverse impacts to water resources.

The fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in impacts different than those previously identified in Section 8.14 of the AFC.

3.15 Geologic Hazards and Resources

Potential impacts from geologic hazards of the proposed facility were described in Section 8.15 of the AFC. The revised natural gas line route, fiber optic cable, refinements to the recycled water line and the raw water line, and the additional laydown areas will not result in geologic hazards and resource impacts other than those previously identified.

A paleontological resources inventory and impact assessment was prepared by Dr. Lanny H. Fisk, PhD, a registered geologist, senior paleontologist, and a principal of PaleoResource Consultants (PRC). It meets all requirements of the CEC (CEC, 2000) and the standard measures for mitigating adverse construction-related environmental impacts on paleontological resources established by the Society of Vertebrate Paleontology (SVP) (1991, 1995, 1996).

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To develop a baseline paleontological resource inventory of the EAEC site and surrounding area and to assess the potential paleontological productivity of each stratigraphic unit present, the published as well as available unpublished geological and paleontological literature was reviewed, and stratigraphic and paleontologic inventories were compiled, synthesized, and evaluated. No subsurface exploration was conducted for this assessment. A field survey, which included a visual inspection of exposures of potentially fossiliferous strata in the project area, was conducted to document the presence of sediments suitable for containing fossil remains and the presence of any previously unrecorded fossil sites. The field survey was conducted on 15 November 2000 by Dr. Lanny H. Fisk.

As noted in Section 8.16 of the AFC, deeper excavations, including trenching for the natural gas pipeline, would disturb the unnamed Quaternary alluvium that contains Rancholabrean-age vertebrate fossils elsewhere. The excavation would also disturb older sediments of the underlying Tulare Formation that could contain Irvingtonian-age vertebrate fossils. Thus, deep excavations could have adverse impacts on significant paleontological resources in either or both stratigraphic units.

As described in the AFC, mitigation measures are necessary because of potential adverse impacts of project construction on significant paleontological resources within both the Tulare Formation and in the unnamed Quaternary alluvium. The proposed Paleontologic Resource Impact Mitigation Program (PRIMP) would reduce, to an insignificant level, the direct, indirect, and cumulative adverse environmental impacts on paleontologic resources that might result from the gas pipeline construction. The PRIMP will include construction monitoring; emergency discovery procedures; sampling and data recovery, if needed; museum storage of any specimen and data recovered; preconstruction coordination; and reporting. The mitigation measures proposed for the project are consistent with CEC environmental guidelines (CEC, 2000) and with SVP standard guidelines for mitigating adverse construction-related impacts on paleontologic resources (SVP 1991, 1995, 1996).

4.0 CUMULATIVE IMPACTS

The cumulative impacts of the proposed changes associated with this Supplement are presented below.

4.1 Air Quality

The cumulative air quality impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.2 Biological Resources

The cumulative biological resource impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.3 Cultural Resources

The cumulative cultural resources impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.4 Land Use

The cumulative land use impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.5 Noise

The cumulative noise impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.6 Public Health

The cumulative public health impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.7 Worker Health and Safety

The cumulative worker health and safety impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.8 Socioeconomics

The cumulative socioeconomic impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.9 Agriculture and Soils

The cumulative agricultural and soils impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.10 Traffic and Transportation

The cumulative traffic and transportation impacts of the proposed project description changes are not anticipated to be significantly different, and for the new gas pipeline route are likely somewhat less than those presented in the Application for Certification.

4.11 Visual Resources

The cumulative visual impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.12 Hazardous Materials Handling

The cumulative hazardous material impacts of the proposed project description changes are not expected to be different than those presented in the Application for Certification.

4.13 Waste Management

The cumulative waste management impacts of the proposed project description changes are not expected to be significantly different than those presented in the Application for Certification.

4.14 Water Resources

The cumulative water resources impacts of the proposed project description changes are not expected to be significantly different than those presented in the Application for Certification.

4.15 Geologic Hazards and Resources

The cumulative geologic hazards and resource impacts of the proposed project description changes are not expected to be significantly different than those presented in the Application for Certification.

4.16 Paleontological Resources

The cumulative paleontological resource impacts of the proposed project description changes are not expected to be significantly different than those presented in the Application for Certification.

5.0 LAWS, ORDINANCES, REGULATIONS, AND STANDARDS CONFORMANCE

The proposed gas line route will require an easement from the USBR. The easement application process will require submittal of detailed engineering design drawings and details. The original preferred gas pipeline route (2a) and two alternatives discussed in the AFC would also have required an easement from USBR. No other LORS apply to this proposed project change or the fiber optic cable, two additional laydown areas, and refinements to the recycled water and raw water pipeline routes. The LORS analysis contained in the AFC for the other environmental areas (identified in Section 3.0 of this supplement) remain unchanged and the LORS analyses contained in the AFC are still applicable and the project remains in compliance with these LORS.